

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
AUGUSTA DIVISION**

**SHIRLEY RADABAUGH,**

**Plaintiff,**

**v.**

**CLAY TURNER REALTY GROUP, LLC,  
Defendant.**

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**JURY TRIAL DEMAND**

**DOCKET NO: 1:20-CV-00058-JRH-BKE**

**DEFENDANT'S RESPONSE TO  
PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT**

COMES NOW, Defendant Clay Turner Realty Group, LLC, ("Defendant"), and submits to the Court this Objection to Plaintiff's Partial Motion for Summary Judgment and contemporaneously files herewith his Brief in Support of the same.

Defendant hereby objects to all claims contained in Plaintiff's Motion for Partial Summary Judgment and Memorandum of Law in Support of Plaintiff's Motion for Partial Summary Judgment on Liability Against Defendant for Copyright Infringement as filed by Plaintiff on November 05, 2020.

Defendant requested and granted an extension of the deadline for response to Plaintiff's Motion through January 11, 2021.

Defendant hereby presents this objection supported by the contemporaneously filed Memorandum of Law in Objecting to Plaintiff's Motion for Partial Summary Judgment on Liability Against Defendant for Copyright Infringement.

**WHEREFORE**, Defendant hereby requests this Court to:

- 1. A HEARING** be scheduled and heard in this matter;
- 2. DENY** Plaintiff's Motion for Partial Summary Judgment;
- 3. ISSUE** any such further relief deemed by this Court as just and proper.

**DATED:** This, **11th** day of **January**, 2021.

Respectfully submitted,

/s/ Kristen T. Jones

Kristen T. Jones  
Attorney for Clay Turner Realty Group, LLC  
GA BAR NO. 632847

**TURNER JONES LEGAL, LLC**  
Post Office Box 1703  
Lincolnton, Georgia 30817  
(706) 359-3332

**CERTIFICATE OF SERVICE**

This is to certify that I have served upon parties and opposing counsel a copy of **Defendant's Response to Plaintiff's Motion for Summary Judgment** as follows:

Richard P. Liebowitz  
Attorney for Plaintiff  
[via CM/ECF Electronic Delivery]  
11 Sunrise Plaza, Suite 305  
Valley Stream, NY 11580

Dorsey R. Carson, Jr.  
Attorney for Plaintiff  
[via CM/ECF Electronic Delivery]  
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Atlanta, Georgia 30305

By statutory electronic service or by placing same in the United States mail with adequate postage thereon to assure proper delivery.

This 11th day of January , 2021.

/s/ Kristen T. Jones

Kristen T. Jones  
Attorney for Defendant  
GA Bar No. 632847

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